

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
(NORTHERN DIVISION)**

**DUTY FREE AMERICAS, INC.
f/k/a WORLD DUTY FREE
AMERICAS, INC., f/k/a DUTY
FREE INTERNATIONAL, INC.**

Plaintiff

Civil Action No. CCB 03 CV 432

v.

**PROSERVE CORPORATION,
a Colorado Corporation and
Joseph M. Aragon, Individually**

Defendants

v.

SIMON FALIC

Counterclaim Defendant

* * * * *

MOTION TO TRANSFER VENUE

Defendant, ProServe Corporation (“ProServe”), by its undersigned counsel, moves, pursuant to 28 U.S.C. § 1404(a), for an Order transferring the entire action to the United States District Court for the District of Colorado.

1. As explained more fully in ProServe’s supporting memorandum of law, which is adopted by reference herein, the balance of factors to be considered under 28 U.S.C. § 1404(a) weighs in favor of transferring this action to the United States District Court for the District of Colorado.

2. And for any reason raised at any hearing or deemed just by this Court.

WHEREFORE, Defendant, ProServe Corporation, respectfully requests that this Court transfer the entire action to the United States District Court for the District of Colorado, and that the Court grant such other and further relief as may be just.

/s/ Lee B. Rauch

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